

Mark R. Thierman, Nev. Bar No. 8285
mark@thiermanbuck.com
Joshua D. Buck, Nev. Bar No. 12187
josh@thiermabuck.com
Leah L. Jones, Nev. Bar No. 13161
leah@thiermanbuck.com
Joshua R. Hendrickson, Nev. Bar No. 12225
joshh@thiermanbuck.com
THIERMAN BUCK LLP
7287 Lakeside Drive
Reno, Nevada 89511
Tel. (775) 284-1500
Fax. (775) 703-5027

GABROY LAW OFFICES
Christian Gabroy (#8805)
Kaine Messer (#14240)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com

Attorneys for Plaintiffs

Sheri M. Thome, Esq.
Nevada Bar No. 008657
WILSON ELSER MOSKOWITZ
EDELMAN & DICKER LLP
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Telephone: (702) 727-1400
Facsimile: (702) 727-1401
Sheri.Thome@wilsonelser.com

AARON FORD
Attorney General
Steve Shevorski
Chief Litigation Counsel
Nevada Bar No. 008256
Leslie Nino Piro
General Counsel
Nevada Bar No. 11672
Kiel B. Ireland
Deputy Solicitor General
Nevada Bar No. 15368
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
Telephone: (702) 486-3420
Facsimile: (702) 486-3773
sshevorski@ag.nv.gov
lninopiro@ag.nv.gov
kireland@ag.nv.gov

*Attorneys for Defendant The State of Nevada,
ex rel. its Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD WALDEN, JR., et al., etc.,

Plaintiffs,

v.

THE STATE OF NEVADA, EX REL. NEVADA
DEPARTMENT OF CORRECTIONS, and
DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**NOTICE OF SETTLEMENT AND
[PROPOSED] ORDER SETTING
DEADLINES**

Plaintiffs DONALD WALDEN JR., NATHAN ECHEVERRIA, AARON DICUS, BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR, and DANIEL TRACY on behalf of themselves and all other similarly situated individuals ("Plaintiffs"), and Defendant STATE OF NEVADA, *EX. REL.* ITS DEPARTMENT OF CORRECTIONS ("Defendant" or "NDOC") (collectively "the Parties"), by and through their respective counsel of record, hereby inform this honorable Court that they have reached a settlement to resolve this action in its entirety, contingent upon State approvals required under Nevada law. The Parties have stipulated to execute a long form settlement agreement no later than Thursday September 29, 2022. (*See* ECF No. 421). Plaintiffs will then be responsible for drafting all the supplemental settlement papers in support of Court approval. Unfortunately, lead counsel for Plaintiffs has numerous prior work and travel commitments in the month of October. Therefore, lead counsel for Plaintiffs is unable to complete all of the preliminary approval papers for filing until mid-November. Accordingly, the Parties stipulate and agree that Plaintiffs shall have until Friday November 11, 2022, to file their Motion for Preliminary Approval of the Collective and Class Action Settlement.

Respectfully Submitted:

Dated: September 16, 2022

THIERMAN BUCK LLP

/s/ Joshua D. Buck
Joshua D. Buck, NV Bar No. 12187
7287 Lakeside Drive
Reno, Nevada 89511
Attorneys for Plaintiffs

Dated: September 16, 2022

WILSON ELSEER MOSKOWITZ EDELMAN
& DICKER LLP

/s/ Sheri Thome
Sheri Thome (NV Bar No. 8657)
300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
*Attorneys for Defendant State of Nevada, ex rel.
its Department of Corrections*

ORDER

Having considered the Parties' Notice of Settlement, the Court hereby ORDERS that Plaintiffs' Motion for Preliminary Approval of the Collective and Class Action Settlement be filed no later than Friday November 11, 2022. The Court further ORDERS that a hearing on Plaintiffs' Motion for Preliminary Approval of the Collective and Class Action Settlement be set for December 1, 2022 at 2:30 p.m. by video conference.

DATED: September 19, 2022



MIRANDA M. DU
CHIEF UNITED STATES DISTRICT JUDGE